

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA : CRIMINAL NO. BPG-16-2254
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 v. : UNDER SEAL
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 HAROLD T. MARTIN, III :
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MOTION TO SEAL COMPLAINT

The United States of America, by its attorneys, Rod J. Rosenstein, United States Attorney for the District of Maryland, and Zachary A. Myers, Assistant United States Attorney for said District, for the following reasons, moves this Honorable Court to order and direct that the criminal complaint and arrest warrant in the above-captioned case should be **SEALED**, and should not appear on the public docket or otherwise be known to the public at this time, as well as close the courtroom for the Initial Appearance.

In support of this motion, the government submits that federal agents are continuing their investigation, which may lead to identification of additional culpable individuals. Premature disclosure of the complaint could compromise the ongoing federal investigation and alert any co-conspirators or associates, which could lead these individuals to flee or destroy evidence.

Respectfully submitted,

Rod J. Rosenstein
United States Attorney

Zachary A. Myers
Assistant United States Attorney

ORDERED as prayed, this 29th day of August, 2016

Honorable Beth P. Gesner
United States Magistrate Judge